

**REMARKS**

Claims 25-56 are presented for reconsideration by the Examiner. The Examiner's objections and rejections will each be addressed below. Based upon the discussion contained below, Applicant believes that each of the claims should be allowable over the prior art.

I. REJECTIONS OF CLAIMS UNDER 35 U.S.C. § 112

The Office Action appears to have rejected claims 36 and 41 on the basis that the dissemination means as recited in claim 36 and 41 is not supported under 35 U.S.C. § 112 6<sup>th</sup> paragraph. That is, the Office Action is expressing the belief that the corresponding structure disclosed in the specification does not adequately support a "dissemination means" as used in claims 36 and 41.

As set forth in its Response A with Amendment faxed to the Office on October 13<sup>th</sup>, 2003, the Applicant identified the function corresponding to the term "dissemination means" as used in claim 36 as to selectively convey the information signals to a coaxial cable, optical fiber, and twisted pair cable. In the case of claim 41, the Applicant identified the function corresponding to the term "dissemination means" as to "selectively" convey any electronic information on the first electronic circuit to any of the first, second or third buses.

In the latest Office Action, it is expressed in the Office Action that the Applicant had correctly identified these functions, but disagreement was expressed that the recited structure identified by the Applicant performed the functions. The Applicant believes that the information provided below will clearly demonstrate the recited functions are adequately supported by the specification.

Generally speaking, one primary advantage to the present invention is that it allows outside and inside information signals on different media to be selectively and conveniently conveyed to select enclosures of a structure. For example, in the case where the structure is a residence, the homeowner may select to have various information signals on different media (each of which may be considered a bus), e.g. coaxial cable, twisted pair cable and fiber optic cable, selectively disseminated throughout the residence through the use of the present invention.

An example of one dissemination means disclosed in the present application will now be discussed to assist the Examiner in understanding the present invention. It should be understood that other embodiments of dissemination means are found in the present application. Referring to Figures 2A and 2B, and their related discussion, one exemplary embodiment of a dissemination means is shown. Incoming information signals on fiber optic cable 106,

coaxial cable 108, and twisted pair cable 110 are connected to the dissemination means. These signals may originate from outside of the structure and may be provided by a commercial operator for example, and may include, without limitation telephone, cable TV, satellite TV and/or internet services. These signals may be selectively disseminated "downstream" into the structure.

The information signals on the twisted pair cable 110 may be split and output to connectors 116. The signals on the fiber optic cable 106 may be split and output to connectors 112. The signals on coaxial cable 108 may be split and output to connectors 114. The use of connectors 112, 114, and 116 allow the information signals to be selectively disseminated throughout the entire structure as will be described below.

The dissemination means may also include sets of connectors 118 through 140. Each set of connectors 118 through 140 includes individual connectors that may be connected to twisted pair cable, a coaxial cable and a fiber optical cable which lead to a second location, typically an enclosure. For example, as seen in Figure 2A, a twisted pair cable 178A, a coaxial cable 178B, and an optical fiber cable 178C are shown extending from a first location (the dissemination means) to a second location (enclosure 148). A first end of the twisted pair cable 178A, the coaxial cable 178B, and the optical fiber cable 178C, are shown attached to the dissemination

means, and in particular connectors 118A, 118B and 118C respectively.

The information signals on the fiber optic cable 106, the coaxial cable 108, and the twisted pair cable 110 may be selectively disseminated to any enclosure in the structure as illustrated in Fig. 4 and described in the related detailed description. The term "selectively" as used in the present application means "all, some, or none" of the wired enclosures of a structure. An illustrative interconnect, which is placed manually and also referred to as a patch cord, is used to accomplish the selective feature of the dissemination means. Thus, to select to send an information signal on the twisted pair cable 110 to enclosure 148, interconnect 206A is manually connected between connector 116A and connector 118A as shown in Figure 4. Likewise, in the illustrative embodiments, to select to send an information signal on fiber optic cable 106 to enclosure 148, interconnect 208B is manually connected between connector 112B and 118B. To unselect the above, the interconnect is disconnected.

It should also be noted that dissemination means may also allow information signals generated from inside the structure to be selectively disseminated "upstream" throughout the structure. These types of signals may be created by electrical devices in the structure and typically do not originate from a commercial service

provider through an outside connection. For example, to select to send an internally generated information signal to enclosure 148, interconnect 202E is manually connected between connector 115E and 118C. Again, to unselect the above, the interconnect is disconnected.

For the reasons above, the Applicant believes that the term "dissemination means" as used in claim 36 and 41 is clearly supported by the specification under 35 U.S.C. § 112 6<sup>th</sup> paragraph. Indeed, through the use of the illustrative manually connected interconnects, any signal may be selectively disseminated to any, some or none of the enclosures (or buses) of a structure.

## II. REJECTIONS OF CLAIMS UNDER 35 U.S.C. § 102

According to the recent Office Action, claims 41 and 44 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Gutenson et al, U.S. Patent No. 5,043,531 (hereinafter "Gutenson"). The Applicant has carefully reviewed Gutenson and can find no teaching or suggestion that the Gutenson device includes a "dissemination means" that allows for selective dissemination of signals throughout a structure.

While Gutenson discloses a wiring layout for new homes capable of distributing information signals throughout a home, Gutenson does not teach or suggest a dissemination means capable of

selectively conveying information signals. The Office Action argues that the splitter 80 (see Figure 2) disclosed in Gutenson is capable of selectively disseminating information signals throughout a home. The function of splitter 80 is to split signals carried on cable 52A such that the signals are distributed to all the cables 52B, 52C, 52D, 52E, and 52F. Gutenson does not teach or suggest that a signal on cable 52A can be selectively disseminated to all, some or none of cables 52B, 52C, 52D, 52E, and 52F. In other words, Gutenson only teaches that the information signals on cable 52A are split into multiple signals by splitter 80 and disseminated to all of the cables 52B, 52C, 52D, 52E, and 52F. Gutenson does not provide, for example, that a signal on cable 52A may be selectively disseminated to only cables 52B and 52C or to only cables 52D and 52E, or any other combination of cables 52B, 52C, 52D, 52E, and 52F. Further, the location of splitter 80 shown in Gutenson indicates that it does not provide for selectively disseminating signals as in the present invention. Splitter 80 is shown in Figure 2 of Gutenson disposed in the ceiling, which location is not easily accessed such that a homeowner may selectively disseminate signals to select locations of the home. Splitter 80 is a passive devices which takes signals on cable 52A and disseminates them to all locations in the structure.

As explained above, in the instant application, the dissemination means allows a homeowner to selectively disseminate information signals to select locations of a structure. This feature is accomplished in part by the use of the illustrative interconnect cables, or patch cables, that allow a homeowner to manually connect and disconnect the various buses leading to the different rooms of a structure. The use of interconnects, or patch cables, (see Figure 4 of the present application and related discussion) is not taught or suggested as a feature of splitter 80 as disclosed in Gutenson. The use of simply a splitter, such as that disclosed in Gutenson, is not capable of selectively conveying information signals. Gutenson does not disclose any structure in relation to splitter 80 that is capable of selectively disseminating information. In fact, the use of solely a splitter would result in information signals being sent to all of the locations in the structure without allowing a homeowner to individually select which rooms receive the signals. Nowhere in Gutenson is it taught or suggested that information signals may be selectively conveyed.

For these reasons, Applicant believes that claims 41 and 44 are not anticipated by Gutenson and that the same are allowable.

III. REJECTIONS OF CLAIMS UNDER 35 U.S.C. § 103

According to the recent Office Action, claims 25-29, 31-35, 42 and 43 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gutenson. Claims 30 and 48-56 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gutenson in view of the Applicant's disclosure. Claims 36-40 and 45-47 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gutenson in view of Humphrey et al. (U.S. patent no. 3,869,582).

First, in regards to claim 25, as was explained above, Gutenson does not teach or suggest that information signals may be selectively disseminated to all, some, or none of the rooms of a structure. Thus, Applicant respectfully disagrees that the service center identified by reference numeral 32 in Figure 2 of the Gutenson patent is capable of selectively conveying information signals to a first, second and third rooms as asserted by the Examiner.

In the *Response to Arguments* portion of the latest Office Action, it states in regard to claim 25 that the Applicant should specifically point out the portions of Gutenson which teach away from the present invention. First, Applicant notes that the topology of the device disclosed in Gutenson is entirely inconsistent with the present invention. Gutenson teaches "[a] wiring layout for new home construction in which primarily two



different cables distribute various electrical signals from a central location to different rooms in a home." (See Gutenson, Abstract). The first cable is an AC power and internal communications cable and the second cable is an external communications cable. These two cables convey information and power to the entire house from a central location. The invention of the present application is not so configured. The illustrative embodiment of the instant invention provides a cable running from each enclosure of a structure to the central location. Thus, for each enclosure of a structure, a separate cable runs to the central location.

In this regard, Applicant again notes that the topology of Gutenson described in connection with the service center 32 does not permit a signal to be selectively conveyed to a first, second and third rooms. In order to allow a signal to be selectively conveyed at the service center 32, each of the rooms would have to be directly and separately connected to the service center 32. This is not the case at all. As best seen in Figure 2 of Gutenson, neither rooms 30A nor 30B are directly connected to service center 32. Instead a single cable 52A leaves service center 32 and runs to splitter 80 as shown in Figure 2 of Gutenson. As was previously discussed, the purpose of splitter 80 is to divide the signals such that they may be disseminated to all of the rooms of the structure,

hence the branch-star topology of the Gutenson device. As was further previously discussed, Gutenson does not teach or suggest that splitter 80 is capable of selectively conveying the information to the different rooms. The latest Office Action does not explain how splitter 80 may selectively conveys signals to different rooms.

Figure 3, a diagram of the service center 32, of Gutenson also illustrates no rooms are directly connected to the service center 32. Moreover, since the rooms of the Gutenson device are not directly connected to the service center 32, service center 32 would not inherently have the required connectors of claim 25 as stated in the latest Office Action. Further, Gutenson does not teach or suggest the use of connectors for different transmission media mounted on a single panel as required by claim 25 and Applicant believes that it is improper for the Examiner to take such a position without pointing out adequate support in the prior art for the same.

In regards to claim 48, the Applicant submits that a distribution panel having at least one CAT5 connector, at least one optical fiber connector, and at least one RG6 coaxial connector disposed thereon would not have been obvious to one of ordinary skill in the art. In the past, control locations had separate distribution panels for each of the different media. The single

distribution panel of claim 48 having connectors for coaxial cables, twisted pair cables, and fiber optic cables is novel and patentable. Applicant again submits that the unsupported statement provided in the Office Action that such a combination would have been obvious is not supported by any of the prior art of record and that a *prima facie* case of obviousness has not been made by the Examiner as is required. A review of Gutenson reveals that it does not teach or suggest a distribution panel configuration.

In regards to the rejection of claim 36, Applicant again notes that Gutenson does not teach or suggest a way to selectively disseminate signals throughout a structure. Gutenson does not teach or suggest that splitter 80 is able to selectively disseminate signals as stated in the latest Office Action. The splitter 80 does not allow routing to specific locations but instead splits an incoming signal to all outlets and not to any one specific location in a structure. Further, Gutenson does not teach or suggest that the splitter 80 comprises the appropriate configuration to allow patching as does the claimed invention. Thus, there is no motivation to use the patch cord as taught by Humphrey with Gutenson. In fact, due to the fact the Gutenson teaches the use of a branch-star topology, a patch cord cannot be used with Gutenson. Therefore, the rejection of claim 36 is inappropriate and should be withdrawn.

In regards to the rejection of claim 45, the central service center 32 of Gutenson does not have groups of connectors that correspond to different locations in a structure. As previously discussed, only a single cable 52 leaves the central service center 32, which single cable 52 is branched to the various locations in a structure. Gutenson, therefore, does not teach or suggest that groups of connectors corresponding to locations in the structure are located at the central service center 32.

Regarding the rejection of claims 26-35, 37-40, 42, 43, 46, 47, and 49-56 under § 103, Applicant submits that based upon the arguments for the allowability of their respective independent claims, that they should each be allowable since they are dependent upon allowable claims. However, Applicant further believes that each of claims 26-35, 37-40, 42, 43, 46, 47, and 49-56 are separately allowable and so requests the same.

#### IV. CONCLUSION

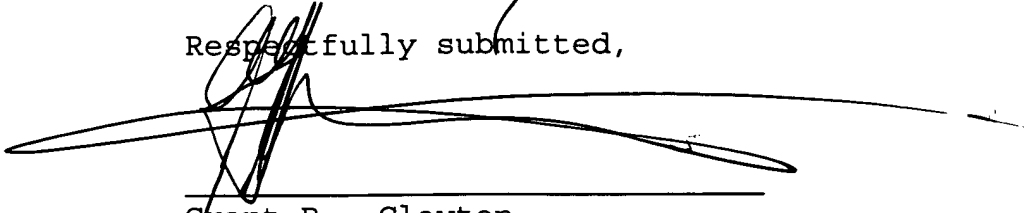
In view of the foregoing, Applicant believes that claims 25-56 are all allowable and the same is respectfully requested. If any impediment to the allowance of these claims remains after entry of

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this Amendment, and such impediment could be alleviated during a telephone interview, the Examiner is invited to initiate the same.

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Respectfully submitted,



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